

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE FLUOR CORPORATION STOCKHOLDER  
DERIVATIVE LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:20-cv-01442-X

(Consolidated with Case Nos. 3:20-CV-  
01558-X and 3:21-CV-00353-X)

**DECLARATION OF SHANE P. SANDERS REGARDING POSTING OF NOTICE OF  
PENDENCY AND PROPOSED SETTLEMENT OF DERIVATIVE ACTIONS AND  
STIPULATION AND AGREEMENT OF SETTLEMENT**

I, Shane P. Sanders, being first duly sworn, state under penalty of perjury that:

1. I am a partner at the law firm of Robbins LLP (the "Firm"), counsel for Lead Plaintiff Jay Lee and plaintiff Alyson Bottoni, and Co-Lead Counsel for plaintiffs in the above-captioned action. I am duly admitted to practice in the State of California, and am admitted *pro hac vice* by this Court in this Action.

2. Pursuant to the Preliminary Approval Order issued by the Court on July 25, 2023 (ECF No. 46), I caused true and correct copies of the Notice of Pendency and Proposed Settlement of Derivative Actions (the "Notice"), and the Stipulation and Agreement of Settlement ("Stipulation") to be posted on August 2, 2023 on the Firm's website. The Notice and Stipulation can be found at [www.robbsinllp.com/notices](http://www.robbsinllp.com/notices).

3. The Notice and Stipulation have remained on the Firm's website through the date of my signature below, and will remain on the website until the Court grants final approval of settlement and the deadline to appeal any final judgment has expired.

4. Attached hereto are true and correct copies of the following exhibits:

Exhibit 1: Declaration of Michael G. Burnett Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 12, 2023);

Exhibit 2: Declaration of Gregory M. Egleston Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 12, 2023);

Exhibit 3: Declaration of Ligaya T. Hernandez Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023);

Exhibit 4: Declaration of Michael I. Fistel, Jr. Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023);

Exhibit 5: Declaration of Phillip Kim Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023);

- Exhibit 6: Declaration of Timothy Brown Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 12, 2023);
- Exhibit 7: Declaration of James M. Ficaro Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023);
- Exhibit 8: Declaration of Edward H. Glenn Jr. Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023); and
- Exhibit 9: Declaration of Dustin L. Schubert Regarding Posting of Notice of Pendency and Proposed Settlement of Derivative Actions and Stipulation and Agreement of Settlement (N.D. Tex. Sept. 11, 2023).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of September, 2023, at Sausalito, California.

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/s/ Shane P. Sanders  
SHANE P. SANDERS

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of September, 2023, the foregoing document was filed using the Court's CM/ECF system. In addition, (1) the filing is available for viewing and downloading via the CM/ECF system, and (2) the CM/ECF system will send notification of this filing to all attorneys of record who have registered for CM/ECF updates.

/s/ Shane P. Sanders

Shane P. Sanders (admitted *pro hac vice*)